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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING  
MOTION TO SEAL**

Judge: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is Plaintiffs' Administrative Motion to Consider Whether Google's Materials Should Be Sealed regarding Plaintiffs' Response to Google's Administrative Motion (Dkt. 833) Re: the Court's Order to Show Cause ("Motion"). Having considered the Motion and supporting declarations, and good cause having been found, the Court **ORDERS** as follows:

Document	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
Plaintiffs' Response to the Court's Order to Show Cause (DKT. 784)	GRANTED as to redacted portions at:  Pages i:19, i:21, 1:9-12, 1:15, 1:18, 2:19, 2:23, 2:25, 3:27, 4:22, 6:3, 6:19, 7:13, 7:18-22, 8:11, 8:19, 8:22-23, 9:1, 9:12, 9:23-24, 9:26, 11:11, 11:22-23, 11:25-27, 12:2, 12:4-5, 12:8, 12:14-15, 12:22, 13:3-4, 13:13, 13:18, 13:20, 14:6-7, 14:10, 14:13, 14:17, 14:25, 16:1, 16:3, 16:8-9, 16:12-13, 16:19, 16:25-26, 17:7, 17:12, 17:15-16, 18:9, 24:8, 25:27	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of internal projects, data fields and logs, and their proprietary functionalities, as well as internal metrics, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit 1 to Mao Declaration	GRANTED as to redacted portions at:  Pages 8:14, 8:26, 10:5, 10:13, 10:24	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information

		reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit 2 to Mao Declaration	GRANTED as to redacted portions at:  PDF Pages 4-6	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various internal projects, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit 3 to Mao Declaration	GRANTED as to redacted portions at:  Pages 1-2	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including a particular data field and its proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies and

		business practices, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit 4 to Mao Declaration	GRANTED as to redacted portions at:  PDF Pages 2-3	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including a particular data field, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit 6 to Mao Declaration	GRANTED as to redacted portions at:  Pages 10:7-8, 13:12, 149:21, 150:1, 150:12-13, 151:8, 152: 4-5, 152:25	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including an internal project, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the

		protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. The information requested to be sealed also contains an individual's personally identifying information.
Exhibit 7 to Mao Declaration	GRANTED as to redacted portions at:  PDF Pages 4-5	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including particular data fields and logs, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Declaration of Christopher Thompson in Support of Plaintiffs' Supplemental Sanctions Brief	GRANTED as to redacted portions at:  Pages 2:6, 2:17-18, 2:20, 2:25, 3:11, 3:27, 4:1, 4:5-6, 4:13, 5:7, 5:11, 5:13-15, 6:3, 6:5-6, 6:8-13, 6:15-16, 6:18-28, 7:1-2, 7:5-	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of internal projects, data fields and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and

	6, 7:24-27, 8:17, PDF page 13	proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Declaration of Jay Bhatia in Support of Plaintiffs' Response to Google's Response to the Order to Show Cause	GRANTED as to redacted portions at:  Pages 2:3-5, 2:12, 3:3-6, 3:8-10, 3:14-16, 3:18-19, 3:22, 3:26-27, 4:7, 4:9, 4:11-12, 4:16-17, 4:20	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including source code, particular data fields and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

**SO ORDERED.**

DATED: \_\_\_\_\_

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HON. SUSAN VAN KEULEN  
United States Magistrate Judge